

FILED

JUL 14 2022

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

GAVIN T. HEAD,

Defendant.

) INDICTMENT

)
)
)
)
) CASE NO.

1 : 22 CR 389
Title 18, United States Code,
Sections 1470, 2251(a), 2422(b)
and 2423(b)

JUDGE FLEMING

COUNT 1

(Enticement, 18 U.S.C. § 2422(b))

The Grand Jury charges:

1. From on or about August 2019, through on or about August 1, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendant, GAVIN T. HEAD, did knowingly use facilities and means of interstate and foreign commerce, that is, a digital device with Internet connectivity, to persuade, induce, entice and coerce an individual who had not attained the age of 18 years, that is, a thirteen-fourteen (13-14) year-old girl, to engage in illegal sexual activity with him, in violation of Title 18, United States Code, Section 2422(b).

COUNT 2

(Interstate Travel to Engage in Illicit Sexual Conduct,
18 U.S.C. § 2423 (b))

The Grand Jury further charges:

2. From on or about July 31, 2020, through on or about August 3, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendant, GAVIN T. HEAD, did knowingly travel in interstate commerce, from the State of North Carolina to the State of Ohio, for the purpose of engaging in illicit sexual conduct, as defined in Title 18, United States

Code, Section 2423(f), with another person, that is, a fourteen (14) year old girl, in violation of Title 18, United States Code, Section 2423(b).

COUNT 3

(Sexual Exploitation of a Child, 18 U.S.C. § 2251(a))

The Grand Jury further charges:

3. From on or about August 2019, through on or about August 17, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant GAVIN T. HEAD, did use, persuade, induce, entice and coerce a minor, whose identity is known to the grand jury, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and such visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 2251(a).

COUNT 4

(Transferring Obscenity to Minor, 18 U.S.C. § 1470)

The Grand Jury further charges:

4. From on or about August 2019, through on or about August 17, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendant, GAVIN T. HEAD, did use a facility and means of interstate and foreign commerce, that is, a device connected to the Internet, to knowingly transfer obscene matter, that is, a digital file containing a visual depiction GAVIN T. HEAD engaged in sexual activity with another person, to an individual who he

believed had not attained the age of 16 years, that is, a thirteen-fourteen (13-14) year-old girl, in violation of Title 18, United States Code, Section 1470.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.